

Exhibit Y

Jamie Renee Schulze

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION
ARIANE ROWLAND and JAMIE
SCHULZE,
Plaintiffs, Case No. CV-20-00059-SPW-TJC
vs.
WATCHTOWER BIBLE AND TRACT
SOCIETY OF NEW YORK, INC.,
and WATCH TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA,
Defendants.

VIDEOCONFERENCE/VIDEOTAPED DEPOSITION
UPON ORAL EXAMINATION OF
JAMIE RENEE SCHULZE

BE IT REMEMBERED, that the
videoconference/videotaped deposition upon oral
examination of Jamie Renee Schulze, appearing at
the instance of the Defendant Watchtower Bible and
Tract Society of New York, Inc., was taken at 211

Jamie Renee Schulze

1 Joyce Hain, and he was a ministerial servant.

2 Q. Okay.

3 A. I was aware of that.

4 Q. And when did Gunner Hain begin to abuse
5 you?

6 A. I can't recollect exact dates, but it
7 would have been around ten to about 12-ish. Nine
8 -- Nine to 12-ish.

9 Q. And what did the abuse -- abuse involve?

10 A. It was grasping at my private parts,
11 trying to arouse me with his fingers, fondling,
12 having me touch him.

13 Q. Anything else?

14 A. No.

15 Q. Okay. When he would grasp at your
16 private parts, would this be over the clothes or
17 under the clothes?

18 A. Under the clothes.

19 Q. Under. And when he would try to arouse
20 you, would that be under the clothes as well?

21 A. Yes.

22 Q. Okay. And it also says that you wanted
23 him to touch -- he wanted him -- he wanted you to
24 touch him, rather? I think that's what you said?

25 A. Yes.

Jamie Renee Schulze

1 Q. Okay. Would he expose himself to you?

2 A. Yes.

3 Q. Okay. Was anyone else ever present when
4 Gunner Hain would abuse you?

5 A. Not in the same room.

6 Q. Are you --

7 A. In the house.

8 Q. Okay. Are you aware of any eyewitnesses
9 to any abuse you suffered at the hands of
10 Gunner Hain?

11 A. I'm not aware of that.

12 Q. Now we can get to the other question.
13 You believe other people were in the house.

14 A. Yes.

15 Q. On at least some of the occasions.

16 A. On some of the occasions, yes.

17 Q. Who else do you believe was in the house?

18 A. Joyce Hain was upstairs.

19 Q. Okay.

20 A. And his daughter, Carla, and I forget his
21 youngest daughter's name. They would be around.
22 Ronda is the older one, yeah. So there are
23 occasions that they were in their rooms.

24 Q. And why would you be at Gunner Hain's
25 home?

Jamie Renee Schulze

1 Q. 2019. That was the first time you became
2 aware.

3 A. Mm-hmm.

4 Q. Okay. And your dad never disclosed it to
5 you sooner than that.

6 A. No.

7 Q. Okay. So let's talk about Bruce a little
8 bit.

9 When are you -- When is your earliest
10 recollection of Bruce abusing you sexually?

11 A. I would say five-ish. About five-ish.

12 Q. And how long do you think it lasted?

13 A. Not as long as the others.

14 Q. Would you say two to three years?

15 A. No, not even that long. Probably about a
16 year.

17 Q. Okay.

18 A. Year or year and a half.

19 Q. And what did Bruce's abuse of you
20 involve?

21 A. Rape.

22 Q. We talked about that one event that
23 occurred, or potentially ten events, Bruce may
24 have been present more than once -- you don't know
25 -- in the basement. Are you talking about that --

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